

### DECLARATION OF SANDRA CHERFRERE

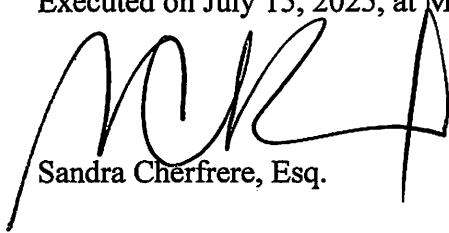
I, Sandra Cherfrere, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am an attorney with Americans for Immigrant Justice, (“AIJ”) a nonprofit law firm based in Miami, Florida. AIJ serves members of Florida’s immigrant community through a combination of direct representation, impact litigation, advocacy and outreach. As part of its immigrants’ rights work, AIJ and its lawyers provide removal defense, asylum assistance, and family-based immigration services. AIJ represents people held in carceral and detention facilities due to their perceived or actual immigration status to advocate for their fundamental constitutional and human rights.
3. I am an attorney in good standing in the state of Florida. I’ve been a member of the Florida Bar since April 1999. I specialize in the practice of immigration law.
4. AIJ has received several calls from people who are detained at “Alligator Alcatraz”, or their family members, requesting legal representation. Our program coordinator, Yanick Laroche, attempted to locate these callers on ICE’s online detainee locator at <https://locator.ice.gov/odls/#/search>, but none appeared in the database. On July 10, 2025, I drove to “Alligator Alcatraz” to visit the people who called our organization for legal services, review their documents, and consider accepting them for representation. Pursuant to the ordinary course of business, I did not schedule my visit beforehand. As an attorney, I have never been required to schedule an in-person visit with a person detained in an ICE facility, either as their legal representative or as an attorney providing a pre-representation consultation.
5. I arrived at “Alligator Alcatraz” between 12:02 p.m.–12:05 p.m. Upon my arrival, I was stopped at the checkpoint by Florida state officials, including police, Florida National Guard, Florida Highway Patrol, Department of Financial Services and Florida Department of Law Enforcement.
6. Two armed military or Marine personnel collected my driver’s license and bar card. Another individual approached and said he is outside security and is only responsible for the perimeter of the facility. He said he did not know what happens inside the facility itself. I never made it inside any building-like structure while at the checkpoint.
7. I was told that the Lieutenant was coming out and that they would ask about the possibility of visiting the detainees.
8. A third individual came out and explained that I was required to complete a form to request a visit. He explained that he did not have enough forms with him (as I had a list of nine to ten names), therefore, he left and returned with more forms.
9. He explained that once the forms were completed, the office would be contacted within twenty-four to forty-eight hours to schedule the visit.

10. I was required to provide each client's information, including "inmate number" (which we interpreted to mean alien number), facility name, and a street address. The form also asks about the type of visit (in-person, video, or phone) and whether the attorney plans to review documents or bring a laptop.
11. I brought G-28 forms and gave them to the officer along with the visitation request form and he promised to deliver them to the person who will contact the office and schedule the visits. He explained that staff would ask the detainees if they wanted to be represented and that once the detainees agree to representation, they will call within twenty-four to forty-eight hours to schedule the visit. It was unclear whether this had happened. There was no E-59 form available.
12. When I asked how I would be able to request a visit in the future, he informed me that I would have to come back and complete the same form and would be notified in twenty-four to forty-eight hours after submitting the form in person.
13. During my time at the checkpoint, I saw other attorneys waiting outside. Visitors, including detained persons relatives, were gathered across the two-road street near a fence, parked along the right side of the street.
14. We were advised that there was an outside air-conditioned bathroom for use, but the individual that informed us could not attest to the cleanliness of the bathroom since he did not use it on that day by the time we spoke. Ultimately, it appeared that no one was being allowed inside the detention center for visits.
15. I was on site for approximately 90 minutes. I was denied entry past the perimeter, which is not within sight of the general facility. I left the checkpoint area at approximately 1:30 p.m.
16. On Friday, July 11, 2025, Yanick Laroche received an email from [admin@southerndetention.com](mailto:admin@southerndetention.com) that they could accommodate an hour video visit between 9:30am – 5:00pm for Saturday, July 12, 2025. I instructed Ms. Laroche to immediately respond and accept a 9:30 a.m. or 10:30 a.m. video visit start time. They responded to submit a name or names for the visit. They said we can have an hour to talk with the detainees.
17. I responded with four names from the list of nine names I had previously provided and waited for a response. Ms. Laroche sent an additional email providing only one name and the other three names as alternatives.
18. Very late Friday night, Ms. Laroche received an email stating that the video visit was cancelled for two reasons: (1) the 9:30 a.m. slot was already taken, and (2) there was a tour scheduled for elected officials on Saturday, July 12, 2025.
19. As of today, there has been no call to schedule visits with the detainees.
20. As a result of the lack of any policy or process for me to contact prospective clients incarcerated at Alligator Alcatraz, AIJ is unable to represent these clients in their immigration proceedings. AIJ is unable to carry out a core component of its public

interest mission to protect and defend the rights of immigrants, including those detained in locked facilities.

Executed on July 15, 2025, at Miami, Florida.

A handwritten signature in black ink, appearing to be 'Sandra Cherfrere', written over the printed name.

Sandra Cherfrere, Esq.